

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

ALI SADR HASHEMI NEJAD,

*Defendant.*

Case No. 18 Cr. 224 (ALC)

**JOINT STATUS REPORT**

The parties respectfully submit this joint status report. Since the filing of the last status report on November 29, 2018 (Dkt. 73), the USAO Filter Team<sup>1</sup> has continued to work with Sadr to implement the joint privilege review plan. The USAO Filter Team and Sadr have agreed on a list of the names of the attorneys and law firms that will be used as search terms in the joint privilege review. The USAO Filter Team expects to release to the prosecution team within the next week the set of documents that did not hit on any of the agreed-upon search terms and that have not been identified as potentially privileged by Sadr.<sup>2</sup>

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<sup>1</sup> The defined terms herein have the same meaning as set forth in the November 15, 2018 joint status report (Dkt. 71).

<sup>2</sup> The USAO Filter Team and its technical personnel continue to work to find a method to cross-reference the USAO Processed Returns with the DANY Processed Returns. Sadr, as noted in the November 29 joint status update, prefers that the set of documents that do not hit on any of the agreed-upon privilege search terms not be released to the prosecution team until a cross-reference enabled the defense to verify that it had not identified any of the documents as privileged. However, in the interest of facilitating trial preparation and based on the Government's assurance that any inadvertent release of a privileged document would not be considered a waiver and would be subject to immediate claw-back, Sadr has consented to the release of those documents to the prosecution team by December 28, 2018.

The USAO Filter Team and Sadr will continue to review the documents that hit on one or more of the agreed-upon search terms or are otherwise identified by Sadr. While the parties will attempt to resolve all privilege assertions in the first instance, based on their initial discussions, the parties believe that the Court's assistance may be required to resolve disputes with respect to certain categories of documents.

Respectfully submitted,

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